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Attorneys for Plaintiff
United States of America

IN THE UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF CALIFORNIA

UNITED STATES OF AMERICA,

Plaintiff,

v.

SARAH ANDERSON,
FABIAN GOMEZ,
EPIFANIO RAMIREZ,
WENDY LABUDA,
WILLIAM OWEN,
JOALEEN ROGERS,

Defendants.

CASE NO. 2:22-CR-147-WBS

STIPULATION REGARDING EXCLUDABLE
TIME PERIODS UNDER SPEEDY TRIAL ACT;
ORDER

DATE: November 6, 2023

TIME: 9:00 a.m.

COURT: Hon. William B. Shubb

STIPULATION

Plaintiff United States of America, by and through its counsel of record, and defendant, by and through defendant's counsel of record, hereby stipulate as follows:

1. This case is set for a status conference on November 6, 2023.
2. By this stipulation, defendants now move to continue the status conference until December 11, 2023 at 9:00 a.m., and to exclude time between November 6, 2023, and December 11, 2023, under 18 U.S.C. § 3161(h)(7)(A), B(iv) [Local Code T4].
3. The parties agree and stipulate, and request that the Court find the following:
 - a) The government has produced discovery in this matter, consisting of over 1,300 pages of investigative reports and photographs, including arrest reports, DEA reports, and other

1 supporting documents. The government has also made available to the defense hours of video
2 surveillance evidence for multiple controlled drug buys in the underlying investigation.

3 b) Defense counsel desire additional time to conduct investigation into the charges,
4 the alleged roles of their respective clients, and to review discovery in this case, including
5 watching the video evidence the government has made available. Defense counsel will need
6 additional time to discuss potential resolutions with their clients, prepare pretrial motions, and
7 otherwise prepare for trial.

8 c) Counsel for defendants believe that failure to grant the above-requested
9 continuance would deny them the reasonable time necessary for effective preparation, taking into
10 account the exercise of due diligence.

11 d) The government does not object to the continuance.

12 e) Based on the above-stated findings, the ends of justice served by continuing the
13 case as requested outweigh the interest of the public and the defendant in a trial within the
14 original date prescribed by the Speedy Trial Act.

15 f) For the purpose of computing time under the Speedy Trial Act, 18 U.S.C. § 3161,
16 et seq., within which trial must commence, the time period of November 6, 2023 to December
17 11, 2023, inclusive, is deemed excludable pursuant to 18 U.S.C. § 3161(h)(7)(A), B(iv) [Local
18 Code T4] because it results from a continuance granted by the Court at defendant's request on
19 the basis of the Court's finding that the ends of justice served by taking such action outweigh the
20 best interest of the public and the defendant in a speedy trial.

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4. Nothing in this stipulation and order shall preclude a finding that other provisions of the Speedy Trial Act dictate that additional time periods are excludable from the period within which a trial must commence.

IT IS SO STIPULATED.

Dated: October 31, 2023

PHILLIP A. TALBERT
United States Attorney

/s/ JAMES R. CONOLLY
JAMES R. CONOLLY
Assistant United States Attorney

Dated: October 31, 2023

/s/ DANIEL B. OLMOS
DANIEL B. OLMOS
Counsel for Defendant
SARAH ANDERSON,

Dated: October 31, 2023

/s/ DAVID D. FISCHER
DAVID D. FISCHER
Counsel for Defendant
FABIAN GOMEZ

Dated: October 31, 2023

/s/ OLAF HEDBERG
OLAF HEDBERG
Counsel for Defendant
EPIFANIO RAMIREZ

Dated: October 31, 2023

/s/ TASHA CHALFANT
TASHA CHALFANT
Counsel for Defendant
WENDY LABUDA

Dated: October 31, 2023

/s/ JOHN R. MANNING
JOHN R. MANNING
Counsel for Defendant
WILLIAM OWEN

Dated: October 31, 2023

/s/ TAMARA SOLOMON
TAMARA SOLOMON
Counsel for Defendant
JOALEEN ROGERS

ORDER

IT IS SO FOUND AND ORDERED.

Dated: November 1, 2023



WILLIAM B. SHUBB
UNITED STATES DISTRICT JUDGE